

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

PARKDALE CENTER, LLC)	
)	
Plaintiff,)	
)	
v.)	Case No.: 2:20-cv-282
)	
LIBERTY MUTUAL INSURANCE)	
COMPANY)	
Defendant.)	

NOTICE OF REMOVAL OF CIVIL ACTION

The Honorable Judges of the United States District Court for the Northern District of Indiana:

Removing party, Liberty Mutual Insurance Company, by the undersigned attorney, respectfully shows this Court:

1. Removing party is the Defendant in the above-entitled action.
2. On June 4, 2020, the above-entitled action was commenced against removing party in the Porter Superior Court of the State of Indiana, Cause No. 64D02-2006-CT-4035, and is now pending therein.
3. On June 11, 2020 removing party was served with a Complaint in the above-entitled action, by registered or certified mail.
4. The above-entitled action is a civil action for damages for breach of a written agreement relating to insurance coverage and for bad faith damages. The amount in controversy, exclusive of interest and costs, exceeds \$75,000.
5. Parkdale Center, LLC is an Indiana LLC with its principal place of business in St. Joseph County Indiana and is therefore deemed to be a resident and citizen of the State of

Indiana residing in St. Joseph County, Indiana. All members of Parkdale Center LLC, are residents and citizens of Indiana.

6. Defendant Liberty Mutual Insurance Company is a company organized under the laws of the state of Massachusetts with its principal place of business in Massachusetts and is therefore deemed to be a resident and citizen of Massachusetts.

7. By virtue of diversity jurisdiction, Defendant is entitled to removal.

8. This Court has original diversity jurisdiction of the above-entitled action pursuant to 28 U.S.C. §1332, and the action may therefore be removed to this Court pursuant to 28 U.S.C. § 1441(a).

9. Copies of all filings in the Porter Superior Court are attached hereto and made a part hereof as **Exhibit A**.

10. This notice is filed with this Court within 30 days after verifying that diversity jurisdiction exists.

11. Copies of this Notice of Removal have been served on all parties and the Clerk of the Porter County Courts.

WHEREFORE, removing party, Liberty Mutual Insurance Company, by counsel, respectfully requests that the above-entitled action be removed from the Porter Superior Court, State of Indiana to the United States District Court for the Northern District of Indiana for trial and determination.

Respectfully submitted,

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*Attorney for Defendant, Liberty Mutual Insurance
Company*

CERTIFICATE OF SERVICE

I hereby certify that on July 30th, 2020 a copy of the foregoing Notice of Removal of Civil Action was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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